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13 **UNITED STATES DISTRICT COURT**  
14 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

15 ACE MARINE RIGGING & SUPPLY,  
16 INC.,

17 Plaintiff,

18 v.

19 VIRGINIA HARBOR SERVICES,  
INC., ET AL.,

20 Defendants.  
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No. SACV11-00436-GW (FFMx)

**NOTICE OF MOTION AND  
MOTION FOR FINAL  
APPROVAL OF PROPOSED  
SETTLEMENT AGREEMENTS  
WITH (1) VIRGINIA HARBOR  
SERVICES, INC., FENITEK  
MARINE SYSTEMS GMBH,  
ROBERT B. TAYLOR, AND  
DONALD MURRAY; (2) MARINE  
FENDERS INTERNATIONAL  
AND GERALD THERMOS; (3)  
WATERMAN SUPPLY CO, INC.  
AND SEYMOUR WATERMAN;  
AND (4) MARITIME  
INTERNATIONAL, INC. AND  
JOHN DEATS**

Date: January 19, 2012  
Time: 8:30 A.M.  
Judge: The Honorable George Wu  
Ctm: 10

1 TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR  
2 ATTORNEYS OF RECORD:

3 **PLEASE TAKE NOTICE** that at 8:30 a.m. on January 19, 2012, or at such  
4 time subject to the Court's calendar, Plaintiff Ace Marine Rigging & Supply, Inc.  
5 ("Plaintiff") will, and hereby does, move before the Honorable George H. Wu,  
6 United States District Judge, at the United States Courthouse, 312 N. Spring  
7 Street, Los Angeles, California 90012, Courtroom 10, Los Angeles, California, for  
8 an order finally approving four Settlement Agreements with the following  
9 Defendants: (1) Virginia Harbor Services, Inc., Fentek Marine Systems GmbH,  
10 Robert B. Taylor, and Donald Murray; (2) Marine Fenders International and  
11 Gerald Thermos; (3) Waterman Supply Co., Inc. and Seymour Waterman; and (4)  
12 Maritime International, Inc. and John Deats.

13 This Motion is brought pursuant to Federal Rule of Civil Procedure 23(e).  
14 In support of this Motion, Settlement Class Counsel relies upon the accompanying  
15 memorandum of law, and all matters of record including the pleadings and papers  
16 filed in this action and oral argument given at the hearing on this matter.

17 WHEREFORE, Settlement Class Counsel respectfully request the Court to  
18 grant this Motion and enter the attached form of Order.

19 Dated: December 5, 2011

/s/ Michael Goldberg

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*Interim Class Counsel, Chair of the  
Executive Committee and Settlement  
Class Counsel*

**PROOF OF SERVICE VIA ELECTRONIC POSTING PURSUANT TO  
CENTRAL DISTRICT OF CALIFORNIA LOCAL RULES  
AND ECF GENERAL ORDER NO. 10-07**

I, the undersigned, say:

I am a citizen of the United States and am employed in the office of a member of the Bar of this Court. I am over the age of 18 and not a party to the within action. My business address is 1801 Avenue of the Stars, Suite 311, Los Angeles, California 90067.

On December 5, 2011, I caused to be served the following documents:

**NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF PROPOSED SETTLEMENT AGREEMENTS WITH (1) VIRGINIA HARBOR SERVICES, INC., FENTEK MARINE SYSTEMS GMBH, ROBERT B. TAYLOR, AND DONALD MURRAY; (2) MARINE FENDERS INTERNATIONAL AND GERALD THERMOS; (3) WATERMAN SUPPLY CO, INC. AND SEYMOUR WATERMAN; AND (4) MARITIME INTERNATIONAL, INC. AND JOHN DEATS**

**[PROPOSED] RULE 54(b) FINAL JUDGMENT ORDER AS TO: (1) VIRGINIA HARBOR SERVICES, INC., FENTEK MARINE SYSTEMS GMBH, ROBERT B. TAYLOR AND DONALD MURRAY; (2) MARINE FENDERS INTERNATIONAL AND GERALD THERMOS; (3) WATERMAN SUPPLY CO, INC. AND SEYMOUR WATERMAN; AND (4) MARITIME INTERNATIONAL, INC. AND JOHN DEATS**

By posting the documents to the ECF Website of the United States District Court for the Central District of California, for receipt electronically by the following parties:

**See Attached Service List.**

And by Electronic Mail to all known non-ECF registered parties.

**See Attached Service List.**

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 5, 2011, at Los Angeles, California.

*s/ Michael Goldberg*  
Michael Goldberg

## Mailing Information for a Case 8:11-cv-00436-GW -FFM

### Electronic Mail Notice List

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## Manual Notice List

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- (No manual recipients)

***Ace Marine Rigging and Supply Inc. v. Virginia Harbor Services Inc., et al.***  
**Case No. 8:11-cv-00436-GW -FFM**

**SERVICE LIST**

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